

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI  
GREENVILLE DIVISION**

**JESSICA FRYREAR**

**PLAINTIFF**

v.

**CIVIL ACTION NO.: 4:22-CV-112-MPM-DAS**

**WASHINGTON COUNTY, MISSISSIPPI  
JARRELL EVANS AND CEDRICK ADAMS,  
in Their Individual Capacities for State Law  
Violations Only**

**DEFENDANTS**

**DEFENDANT WASHINGTON COUNTY, MISSISSIPPI'S MOTION TO STAY**

**COMES NOW**, Defendant, Washington County, Mississippi, by and through counsel, and respectfully moves this Court for a stay of this proceeding pending Defendant's Motion for Judgment on the Pleadings [Doc. 19] and would state to the Court as follows, to-wit:

**I. BACKGROUND**

Plaintiff Jessica Fryrear filed this lawsuit against Defendant Washington County. Washington County has now answered [Doc. 16] and filed a Motion for Judgment on the Pleadings [Doc. 19].

**II. AUTHORITY**

Defendant Washington County has moved to dismiss all the claims against it, including Plaintiff's failure to state a claim under *Monell*, an immunity-based legal theory. A stay is proper under *L. R. 16(b)(3)(C)* as the County has invoked an immunity-based defense. Moreover, a stay now will save judicial resources and time and un-necessary legal expense, as this matter may fully be resolved on this motion without the need for discovery. For this additional reason, a stay in this matter is appropriate.

**WHEREFORE, DEFENDANT RESPECTFULLY PRAYS** that the Court stay this proceeding pending Defendant's Motion for Judgment on the Pleadings [Doc. 19].

**RESPECTFULLY SUBMITTED** this the 25<sup>th</sup> day of October, 2022.

**JACKS GRIFFITH LUCIANO, P.A.**

By: /s/ ***Bethany A. Tarpley***

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**CERTIFICATE OF SERVICE**

I, Bethany A. Tarpley, attorney of record for Defendant, Washington County, Mississippi, do hereby certify that I have this day caused a true and correct copy of the above and foregoing *Defendant Washington County, Mississippi's Motion to Stay* to be delivered by the ECF Filing System which gave notice to the following:

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**DATED** this 25<sup>th</sup> day of October, 2022.

/s/ *Bethany A. Tarpley*  
Bethany A. Tarpley